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13 **UNITED STATES DISTRICT COURT**

14 **DISTRICT OF NEVADA**

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16  
17 LAS VEGAS SUN, INC., a Nevada  
corporation,

18 Plaintiff,

19 v.

20 SHELTON ADELSON, an individual and as  
the alter ego of News+Media Capital Group  
21 LLC and as the alter ego of Las Vegas Review  
Journal, Inc.; PATRICK DUMONT, an  
22 individual; NEWS+MEDIA CAPITAL  
GROUP LLC, a Delaware limited liability  
23 company; LAS VEGAS REVIEW-JOURNAL,  
INC., a Delaware corporation; and DOES, I-X,  
24 inclusive,

25 Defendants.

Case No. 2:19-cv-01667-GMN-VCF

**JOINT STIPULATION TO CONTINUE  
HEARING ON PLAINTIFF'S MOTION  
TO COMPEL PATRICK DUMONT'S  
DEPOSITION PREPARATION  
MATERIALS [ECF NO. 528]  
AND  
PLAINTIFF/COUNTERDEFENDANTS'  
MOTION TO COMPEL PRODUCTION  
OF DOCUMENTS IN RESPONSE TO RFP  
NO. 523 [ECF NO. 534]**

**(FIRST REQUEST)**

1 LAS VEGAS REVIEW-JOURNAL, INC., a  
2 Delaware corporation,

3 Counterclaimant,

4 v.

5 LAS VEGAS SUN, INC., a Nevada  
6 corporation; BRIAN GREENSPUN, an  
7 individual and as the alter ego of Las Vegas  
8 Sun, Inc.; GREENSPUN MEDIA GROUP,  
9 LLC, a Nevada limited liability company, as  
10 the alter ego of Las Vegas Sun, Inc.,

11 Counterclaim-  
12 Defendants.

1 Plaintiff/Counterdefendant LAS VEGAS SUN, INC., and Counterdefendants BRIAN  
2 GREENSPUN and GREENSPUN MEDIA GROUP, LLC (collectively the “Sun”), by and through  
3 their counsel Lewis Roca Rothgerber Christie LLP, Pisanelli Bice PLLC, and the Alioto Law Firm,  
4 and Defendant/Counterclaimant LAS VEGAS REVIEW-JOURNAL, INC., and Defendants  
5 NEWS+MEDIA CAPITAL GROUP LLC, SHELDON ADELSON, and PATRICK DUMONT  
6 (collectively the “Review-Journal”), by and through their counsel of record, Kemp Jones, LLP,  
7 and Jenner & Block LLP, hereby stipulate and agree as follows:

8 1. The hearing on Plaintiff’s Motion to Compel Patrick Dumont’s Deposition  
9 Preparation Materials [ECF No. 528] and Plaintiff/Counterdefendants’ Motion to Compel  
10 Production of Documents in Response to RFP No. 523 [ECF No. 534] is currently set for February  
11 8, 2022 at 9:00 a.m. *See* ECF No. 571.

12 2. Michael Gayan, counsel for the Review-Journal, will be arguing one of these  
13 motions. Mr. Gayan needs to argue motions at a hearing in Nevada state court set at the same time  
14 (February 8, 2022 at 9:00 a.m.). That hearing cannot be rescheduled due to time-sensitive issues  
15 in the case.

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3. Subject to the Special Master's availability, the Parties agree to continue the hearing of the motions currently set on February 8 (ECF Nos. 528, 534) to February 10, 2022 at 9:00 a.m.

DATED this 1st day of February, 2022.

DATED this 1st day of February, 2022.

LEWIS ROCA ROTHGERBER CHRISTIE LLP KEMP JONES, LLP

By: /s/ Kristen L. Martini

By: /s/ Michael J. Gayan

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IT IS SO ORDERED:



SPECIAL MASTER PHILIP M. PRO

DATED: **February 2, 2022**